

From: [Coltrain, Katrina](#)
To: [Newton, Heather](#)
Cc: [Burgess, Michele](#); [Poore, Christine](#); [Turner, Philip](#); [Atkins, Blake](#)
Subject: 06GG- Wilcox Oil Company - Draft Early/Interim Action Proposed Plan for sources
Date: Tuesday, January 16, 2018 10:27:00 AM
Attachments: [Lead Consult Form for Interim Source Response 1-16-18.docx](#)

Hi Heather, Please see the attached lead consultation summary.

Katrina Higgins-Coltrain
Remedial Project Manager
US EPA Region 6
LA/OK/NM Section (6SF-RL)
1445 Ross Avenue
Dallas, Texas 75202
214-665-8143

From: Poore, Christine
Sent: Tuesday, January 02, 2018 1:56 PM
To: Coltrain, Katrina
Cc: Newton, Heather ; Burgess, Michele
Subject: RE: 06GG- Wilcox Oil Company - Draft Early Action Proposed Plan for sources

Hi Katrina,

Thanks for the opportunity to review this document. Attached are in-text comments and my larger comments are provided below. Please take a look at my comments and let me know when is a good time to discuss them.

1. Based on the R6 lead strategy, lead sites should come in for an HQ consultation. I've cced Heather Newton and Michele Burgess so they're aware of incoming consultation. I've also attached a form to schedule the consultation (send back to me and I'll schedule the consultation).
2. Why is tank removal not being done under removal? Do these tanks contain oil (we don't usually address oil)?
3. Based on the description of the material being addressed, I don't understand why it's not considered PTW and I'm surprised that there are no hazardous wastes given the concentrations provided.
4. The soil (?) concentrations for the tank COCs appear to be relatively low (only one would be above 10-4), please expand on the basis for addressing these as source materials.
5. The preference for treatment should be discussed, as well as why it isn't being met (shouldn't be punted to the final ROD).
6. The RAOs should be revised to be measurable and include the media involved.

Thanks!

Christine

From: Coltrain, Katrina
Sent: Friday, December 08, 2017 10:51 AM
To: Hebert, Michael <hebert.michael@epa.gov>; Malott, Vincent <malott.vincent@epa.gov>; Poore, Christine <Poore.Christine@epa.gov>; Biggs, Kirby <Biggs.Kirby@epa.gov>; Baumgarten, Gary <baumgarten.gary@epa.gov>; Stankosky, Laura <stankosky.laura@epa.gov>
Cc: Meyer, John <Meyer.John@epa.gov>; Atkins, Blake <Atkins.Blake@epa.gov>
Subject: 06GG- Wilcox Oil Company - Draft Early Action Proposed Plan for sources

All,

Please find attached, the draft Early Action Proposed Plan to address sources at the Wilcox Oil Company Superfund Site in Bristow, OK. Also, accompanying this Proposed plan is the Technology Screening Memo.

Note: this is an early action taken during the RI. There is no final RI, FS, or risk assessments.

For quick reference guidance documents are also attached.

Thank you for taking the time to review.

Attachments include:

Technology Screening:

Wilcox early action alternatives screening 12-2017 draft.docx

RACER cost estimates screening technologies 12-8-17.pdf

Figure 1 table 3-2 Technology Screening matrix.pdf

Proposed Plan:

Wilcox early action draft Proposed plan text boxes 12-8-17.docx

Wilcox early action PP draft tables 12-8-17.docx

Wilcox early action draft Proposed plan text 12-8-17.docx

Wilcox early action draft figures 12-8-17.pdf

Guidance documents:

NCP preamble

Early Action Guidance 1991

ROD guidance Chapter 8

Katrina Higgins-Coltrain

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Lead Site-Specific Consultation for Response Actions

Please complete questionnaire and submit to Heather Newton (newton.heather@epa.gov) three days before scheduled site-specific consultation.

Site Name: Wilcox Oil company

Region: 6

Date Submitted:

Name of EPA Regional Point of Contact for Site: Katrina Higgins-Coltrain

EPA Site ID: Site Charging Code: T 06L 06GGCO00

City, County, State: Bristow, Creek County, OK

Remedial or Removal Response: remedial

Response Lead (e.g., EPA, Federal Agency, State): EPA

Site type (provide figures where appropriate)

What is type of site and source of lead? (e.g., smelter, battery cracker) Oil refinery

Are there other non-CERCLA related sources of lead at the site? None identified

What media have known lead contamination? (Summarize maximum, mean and minimum concentrations of lead found by media)

Refinery treatment residual. This is a distinct source area of the site.

Concentrations range up to and greater than 55,000 mg/kg

Are there other contaminants of concern that may co-occur with lead? None identified in this area.

What is the background level of lead for the site? 5-10 mg/kg

Are the groundwater or drinking water supplies impacted by lead at the site? No

Determination of Risk and Clean-up Concentrations

What are the unacceptable human health and/or ecological risks at the site? Currently in RI phase.

Remediation of lead is proposed as an interim action along with the early action related to tank bottom sludges. Lead area poses a direct exposure risk to receptors and field personnel while also being a continual source for the migration of lead to surface water and sediment. The lead area needs to be addressed to mitigate migration and support worker safety.

Have other agencies/entities performed site-specific blood lead level analyses? No. Currently, there are no residents on this property and no children living on this property.

Briefly describe the sampling strategy for the site. (e.g., composite, grid, criteria justifying response)

The lead source area was delineated during phase 1 with XRF. Previous grab samples collected by the Oklahoma Department of Environmental Quality provide the laboratory results. Additional grab samples during the RI as well as preliminary delineation performed by OSRTI field teams is being used to estimate the source area boundary to address the highest concentrations. All soil outside of the source area will be addressed under the final site-wide ROD and final human health risk assessment.

Lead Site-Specific Consultation for Response Actions

Were the Integrated Exposure Uptake Biokinetic Model (IEUBK) and/or the Adult Lead Methodology (ALM) used to derive soil screening levels (SSLs), preliminary remediation goals (PRGs) and cleanup levels (CULs)? (List lead SSLs, PRGs and CULs) No. Extreme concentrations present in the sweetening area are evident. The source area is a distinct area of the site.

The model is indirectly applied in that the use of all default values provide for a lead concentration that is well below that found in the source area.

What is the target blood lead level? The purpose of the early action is to remove the residual lead source. Final cleanup numbers for the site will be addressed in the final ROD. The target, based on site data and source area characteristics is a range of 200-400 mg/kg. Any areas outside of the source area and exceeding the target range will be addressed under the final site ROD.

Were the default non-media input parameters for the IEUBK/ALM used? (Yes or No). If not, what parameters were modified in the IEUBK/ALM? (e.g., model mass fraction of soil in indoor dust (MSD), geometric standard deviation (GSD) or the mass fraction of house dust derived from outdoor soil, and/or soil-dust ingestion rate) The model was not used. Final lead cleanup levels will be determined in the final site risk assessment and final ROD for the site.

The model is indirectly applied in that the use of all default values provide for a lead concentration that is well below that found in the source area.

Was site-specific bioavailability used or the default absolute bioavailability? No.

Was the Technical Review Workgroup for Metals consulted? (If yes, provide consultation date) No.

Identify current and anticipated future land use. (e.g., residential vs. commercial/industrial vs. agricultural vs. recreational vs. future residential) Currently the property is 'used' as residential which is expected to be an option in the future. However, the site most likely will be industrial given other site contamination. Until a final ROD is completed, the source area will be addressed to mitigate lead migration to surface water and sediment and to protect workers.

Proposed Response Action(s)

Describe the components of the proposed response action(s). (Include remedial action objectives, lead action level (if hot spots are being addressed), cleanup levels, institutional controls and indoor clean-up if applicable.)

The proposed action is to remove the lead residual within the source area to a target cleanup level of 200-400 mg/kg. Final risk assessment, site characteristics, and lead cleanup levels will be documented in a final ROD. Materials will be shipped to and disposed of in an offsite permitted RCRA disposal facility.

If the response action includes excavation, specify areal extent and depth.

Area: 88188 sf

Depth: 2 ft

Volume: 176376 cf (6,532.44 cy)

Lead Site-Specific Consultation for Response Actions

Will residential yards be cleaned property border to border? No residential property. The lead area is a distinct source at the back of the process area. The lead source area is not within a residential yard.

Describe the anticipated construction QA to be conducted (e.g. backfill soil lead conc. determined, post-excavation sampling, were samples composited?)

Backfill will be consistent with background, but no greater than the cleanup range of 200-400mg/kg. Post excavation sampling will include grab samples on a grid.

Describe the current communication/community outreach strategy for this response action.

Frequent community meetings are conducted along with individual meeting with residents in the area and the owners of the site properties.

Has there been any communication with local/state/tribal governments related to lead abatement programming? If so, please describe. No.

Describe any other agency's involvement for this response action. ODEQ and EPA work closely to plan and implement investigation strategies and community outreach.

Describe level of public, other agency's interest as well as Congressional Interest. The media are interested and report on site progress frequently.